UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
ISRAEL GAMERO, NORBERTO MASTRANZO AND OSCAR SANCHEZ, individually and on behalf of others similarly situated,	Index No. 15-cv-02697 (KPF)
Plaintiffs,	
-against- KOODO SUSHI CORP. (d/b/a KOODO SUSHI), RAYMOND KOO and MICHELLE KOO,	
Defendants.	

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed memorandum of law, the undersigned will move this Court, at the United States Courthouse for the Southern District of New York, before the Honorable Katherine P. Failla for an Order precluding testimony of Defendants' witnesses "Yazhong Zhang" and "Quirong Lin" together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York September 16, 2016

MICHAEL FAILLACE & ASSOCIATES, P.C.

By: __/s/SHAWN CLARK __

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